

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUSAN FREDRICKSON,)	
)	
v.)	Case No. 07 C 6157
)	
VILLAGE OF WILLOW SPRINGS, ALAN NOWACZYK, and ANNETTE KAPTUR,)	Judge Grady
)	Magistrate Judge Nolan
)	
Defendants.)	

**DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO FILE REPLY BRIEF**

Now come Defendants, the Village of Willow Springs, Alan Nowaczyk and Annette Kaptur, by their attorneys, Odelson & Sterk, Ltd. and John Murphey, and respectfully request an extension of time to file their Reply in support of their Motion to Dismiss, and in support state as follows:

1. Defendants have filed a Joint Motion to Dismiss and Memorandum in Support.
2. Defendants have also filed a Motion for Sanctions.
3. Plaintiff has filed her Response to the Motion to Dismiss and Motion for Sanctions.
4. Defendants' Reply in support of their Motion to Dismiss is due on April 25, 2008.
5. Defendants have been working on their Reply, but have not be able to complete the Reply by April 25, 2008 because of the following:
 - (i) Counsel for the Village has just completed a Motion for Summary Judgment in the matter of *Owens v. City of Calumet City*, 06 C 3276, which was filed on April 23, 2006.
 - (ii) Defendants Nowaczyk and Kaptur's attorney, John Murphey, has recently completed the trial in the matter entitled *Coary v. City of Northlake*, 06 L 3747.

- (iii) Based upon the above, the attorneys representing the Village and individual Defendants have been unable to confer on preparation of their Joint Reply in Support of their Motion to Dismiss.

6. This motion is not being brought to cause any undue delay or prejudice to Plaintiff.

7. On April 24, 2008, Attorney McGrath spoke to Plaintiff's attorney, Glen Gaffney, to request a one week extension to file Defendants' Reply. Attorney Gaffney advised Attorney McGrath that he had no objection to a one week extension for Defendants to file their Reply.

8. Defendants hereby request an extension of time to file their Joint Reply up to and including May 2, 2008. This will be Defendants final request for an extension of time to file their Reply.

WHEREFORE, Defendants pray that this Court enter an order granting Defendants an extension of time to file their Reply in Support of their Motion to Dismiss by May 2, 2008.

Village of Willow Springs

By: /s:/ Michael J. McGrath

/s:/ John Murphey

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